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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION I

# Response To Comments Received At The Public Meeting Held June 18, 1984 In Fairhaven, Massachusetts

July 18, 1984



The following are responses to written and oral comments received by the United States Environmental Protection Agency (EPA) at the public meeting held in Fairhaven, MA on June 18, 1984. These responses cover only those issues under the purview of the EPA. EPA has forwarded health issues to the Massachusetts Department of Public Health (MA DPH), and other environmental issues to the Massachusetts Department of Environmental Quality Engineering (MA DEQE) for their responses. EPA will forward their responses to you upon our receipt.

Response to Comments
Fairhaven, MA Public Meeting
of June 18, 1984

1. Why is EPA still studying the PCB problem in New Bedford Harbor?

The contamination of New Bedford Harbor and surrounding areas is one of the most complex environmental problems facing EPA's Superfund program. EPA is required by the Superfund law to study Superfund sites in a specific, methodical manner. Given the possible serious consequences of taking incorrect actions at such a complex site, to act in haste would be irresponsible on EPA's part and be contrary to the law.

Although some studies of the harbor's PCB problem have been conducted by various agencies and research institutions since the late 1970's, there are still significant gaps in the information needed to propose cost-effective clean-up actions that will assure the protection of public health, welfare, and the environment. With input from other federal, state, and local agencies, and the public, EPA has proposed a comprehensive investigation to assess the PCB problem on an areawide basis. These studies were initiated in the fall of 1983 and will continue for another 18 to 24 months.

One of the most serious problems that EPA and the U. S. Coast Guard have identified is the existence of a PCB hot spot in the Acushnet River and the transport of PCBs from this area into New Bedford Harbor. EPA has sufficient data on the hot spot area and has, therefore, initiated a fast-track feasibility study to address this problem.

2. What is the status of the Acushnet River Hot Spot feasibility study?

The study will be available for public comment in August. The feasibility study will look at many types of possible clean up alternatives for the hot spot. Technologies investigated include: Dredging, in-place treatment, in-place containment, incineration, biodegradation, land disposal, shore-line disposal, and other technologies. The study will screen these alternatives based upon protection of public health and the environment, cost-effectiveness, implementability, reliability, and other factors. Finally, the report will propose several remedial alternatives for consideration to resolve the hot spot problem. The public will be given an opportunity to review and comment on the draft document when it is released in August.

3. What is being done about exposed mud flat PCB hot spots near Aerovox?

The mud flats in the vicinity of the Aerovox facility are included in the fast-track feasibility study, discussed above. Two areas of concern identified by citizens are: (1) elevated PCB levels in the ambient air; and, (2) access to this area.

In August and September of 1982, EPA conducted an areawide ambient air monitoring program for PCBs. Five monitoring stations were located in the area. Two were generally in an upwind direction from Aerovox, one due southwest and another due southeast. The other three stations were sited on anticipated downwind vectors, one to the east-northeast and two due north of the site. The two upwind stations had total PCB concentrations averaging 10 to 11 $ng/M^3$* and were typical of the background stations.

PCB concentrations to the north (N) and east-northeast (ENE) were significantly higher than the upwind stations. The N station had concentrations of 83 $ng/M^3$ and 92 $ng/M^3$. The ENE station, located in Acushnet, had PCB concentrations ranging from 51 $ng/M^3$ to 88 $ng/M^3$.

Background levels of PCBs in urban areas are, generally, in the vicinity of 10 $ng/M^3$. Boston, for example has reported a PCB level of 7.1 $ng/M^3$. The United States presently does not have ambient air standards for PCBs. Therefore, it is difficult to assess the long term significance of the elevated PCBs near the hot spot. However, the Canadian Ministry of the Environment has established an ambient air guideline for Canada. The level established in Canada is 150 $ng/M^3$ as a 24-hour average.

PCB levels near the Acushnet River hot spot are significantly lower than the Canadian guideline. Therefore, there is no apparent immediate risk to public health from short-term exposures to the PCB levels detected. However, to protect public health from possible effects due to long-term exposure, the reduction of ambient air PCB levels is one of the major goals of EPA's hot spot feasibility study.

Concerning access to the mudflats, as discussed at the meeting, EPA does not feel that is is feasible to fence off and limit access to such an extensive area as the hot spot. In addition, our experiences at other sites lead us to conclude that a fence would not provide effective security. However, access to specific areas will be evaluated on a case-by-case basis to determine if site security is needed and can be provided in an effective, feasible manner.

At a minimum, EPA will re-post the area with bilingual signs warning residents of the potential danger. EPA will also continue to work aggressively through our community relations program to alert the community to the hazards these areas may pose to public health. Our first step in this program was conducted this past spring with the distribution of 26,000 pamphlets through the area's school systems which provided factual information about PCB's and the presence of PCBs in the harbor.

4. <u>What is the status of the New Bedford sewer line clean up?</u>

EPA issued administrative orders to Cornell-Dubilier Electronics to clean out the PCB contaminated sewer lines, and to the City of New Bedford to monitor the sewage treatment plant for PCB's for one year. Cornell is scheduled to begin the clean up in July and complete the work by the end of August.

*namogram per cubic meter, a namogram is one billionth of a gram.

The City began their monitoring program this past June, and is to submit the data to EPA by the end of July. The sampling plan is designed to monitor the effectiveness of the sewer line cleanup and determine if PCB's continue to contaminate the sewerage system.

5. Does EPA plan to cap Sullivan's Ledge prior to other possible remedial actions?

As a part of the air monitoring program discussed in question 3, EPA located a sampling station at Sullivan's Ledge. The Ledge had the highest PCB levels in the test area with an average concentration of 260 ng/$M^3$. EPA will conduct additional air monitoring by this fall to determine the impact on the surrounding area of this source of PCBs.

The levels found in the first investigation represent expected worst case on-site conditions. It is expected that the impact of the Ledge on the surrounding area's air quality on a short-term basis will not be significant because the Ledge represents a small source of PCBs to the surrounding area's air. Therefore, EPA will not make a decision on possible source reduction measures until a second round of air monitoring is completed.

A major factor influencing this decision is the fact that there are no residential areas in the immediate vicinity of Sullivan's Ledge. Commercial properties border the site, and, therefore, the type of exposure of concern is workplace exposure. The Occupational Safety and Health Administration (OSHA) has establised standards for workplace exposure to PCBs. The recommended OSHA level is 0.5 mg/$M^3$* for Aroclor 1254 and 1 mg/$M^3$ for Aroclor 1242. The average levels found at the Ledge are approximately 4,000 times lower than the 0.5mg/$M^3$ standard, and about 2,000 times lower than the 1 mg/$M^3$ standard. Therefore, there is also no cause for immediate action for possible workplace exposures from Sullivan's Ledge.

Another concern EPA is investigating is that of site security. In June EPA's Emergency Response Team conducted a site survey which included additional soil sampling for PCBs. After completing their analysis of the data, they will make a recommendation to the Superfund Division Director concerning site access problems. By August a decision should be made concerning the erection of a fence or other possible security options.

6. Investigation of other possible areas of PCB contamination.

During the development of the Superfund planning document, the RAMP, citizens expressed concern over possible, as yet undisclosed, areas that may be contaminated with PCBs. As a result of this concern EPA included in its Superfund activities an investigation of such areas.

*milligram per cubic meter, a milligram is one thousanth of a gram.

In April this task was initiated by EPA's Superfund contractor. Presently, the primary focus is on areas where contaminated dredge spoils may have been disposed of, areas where PCB waste products may be disposed of, and properties where PCBs may have been used on-site. Many of the areas to be investigated were identified by local citizens during the RAMP process.

Presently, EPA has no plans to sample soils in those areas where the agency has no information indicating that PCB contamination occurred. However, EPA is again requesting that anyone with information concerning possible sites that may be contaminated with PCBs notify:

Gerard Sotolongo
United States Environmental Protection Agency
Room 1903
John F. Kennedy Federal Building
Boston, MA 02203

7. Will Cushman Park in Fairhaven be tested?

The Massachusetts Department of Environmental Quality Engineering (DEQE) has tested surface soil samples from Cushman Park for organic pollutants and toxic metals. DEQE did not identify any contaminants that may be posing a threat to human health.

During our upcoming field investigations, EPA will test some of the drainage areas in Cushman Park that area residents have indicated are periodically flooded by the Acushnet River for PCBs, and, therefore, could be contaminated.

8. Does EPA intend to involve the public in the Superfund process?

Since the listing of New Bedford on the Superfund National Priorities List EPA has conducted a responsive community relations program to ensure public involvement. During the development of the RAMP the Agency actively solicited public participation through public meetings and direct contact with private citizens. Several groups including the Sierra Club, and LIFE commented on the RAMP and have continued to be actively involved in working towards a resolution to this problem. More recently, groups including the Coalition for Bay Cleanup and the Southeastern Health Project have formed and have communicated their concerns to EPA.

At major decision making points EPA holds public meeting to listen and respond to concerns raised by the public and, where possible, incorporate their suggestions into proposed actions. In addition, Gerard Sotolongo, EPA's New Bedford Project Officer, is in frequent communication with local officials, groups, and individuals to assure that we are aware of the many diverse concerns of the area residents.

In addition to these activities, EPA has recently published an informational fact sheet titled "PCBs and New Bedford Harbor: Clarifying the Issues." EPA also publishes a monthly newsletter to keep citizens informed on past and future Superfund activities. Anyone interested in these publications should contact:

Debra Prybyla
U.S. Environmental Protection Agency
Public Affairs Office
John F. Kennedy Building
Boston, MA 02203

EPA is proud of its record of public involvement and communication in dealing with the area's complex PCB problem. We will continue to be responsive to the community's concerns through our community relations program. We welcome sugggestions on ways to improve the program.

9. What is EPA doing to restrict the discharge of toxic pollutants into surface waters?

The Region is initiating an enforcement effort through the National Pollution Discharge Elimination System (NPDES) and the pretreatment program to restrict the discharge of priority pollutants. The second round NPDES permits which are presently being issued will require more stringent removal of toxic discharges from industrial wastes. The permits will require all industries to meet Best Available Technology (BAT) limits as developed by National Standards. All indirect discharges to Public Treatment Plants will be required to meet national and local pretreatment standards. These standards have begun to go into effect as of April 28, 1984. EPA is committed to ensure all direct and indirect discharges comply with the new more stringent permits for the discharge of pollutants.

10. What is the status of the Re-Solve cleanup?

Notice to Proceed with construction was issued to CECOS, International on June 25, 1984. Thus, the 270 day time period allowed under the contract to complete the on-site remedial actions has begun. Mobilization activities are now in progress.

11. Will air monitoring be conducted at the Re-Solve site during clean-up activities?

In response to citizen concerns expressed during the Feasibility Study public hearings about air emissions during construction, EPA's engineering firm conducted an assessment of potential air emissions during excavation using the lagoon contaminants of high volatility and air dispersion calculations to determine the impact, if any, on the nearest receptors (humans). The estimated impact was determined to be negligible. Nevertheless, the bid documents for

the remedial action required that perimeter and on-site monitoring be conducted during construction. CECOS submitted plans for this monitoring as part of their Health & Safety Plan, which has been approved by the Army Corps of Engineers. Monitoring for PCB's (particulate & vapors), metals (particulate and vapors) and organics will be conducted routinely during site activities. The On Scene Coordinator will monitor the site air quality routinely and will require the contractor to modify working methods and/or halt construction to ensure the safety of both area residents and the construction crews.

12. Does EPA consider possible off-site migration of contaminants at Re-Solve to be of primary concern?

Off-site migration of contaminants via surface waters and groundwater has always been a primary concern. Source removal was justified on the basis that on-site containment methods, while adequate to mitigate any direct contact hazard, would be inadequate to prevent continued off-site migration. A report on this migration will be issued in August followed by a Feasiblity Study later this year.

13. What is the status of the Route 6 public well in Dartmouth?

The Route 6 Public well was not considered as part of the Re-Solve site at the time of NPL listing and during the RAMP and field studies because it is not geographically contiguous to the Re-Solve facility. The MA DEQE took action to remove drummed wastes from the H & M Drum Co., Inc. in 1981 which was responsible for the Route 6 well contamination. DEQE has not submitted the site for NPL listing because they are considering enforcement action against the site owners.